

EXHIBIT C: SUMMARY OF D&G TIME RECORDS



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K&H Restaurant Inc.
411 Lexington Avenue
New York, NY

EIN # 13-1504385
March 15, 2017
Bill Number 320651
File Number 030248

Attn: Mohammed Prince

FOR PROFESSIONAL SERVICES RENDERED
From March 14, 2017 Through July 14, 2017

Diamondrock NY Lex Owner LLC
File Number 030248-0001-000

			Hours	Amount
03/14/17	JBSS	Review correspondence from Andrew G. and client regarding state court adversary proceeding and strategy regarding adversary proceeding.	0.40 Hrs	\$230.00
03/14/17	JBSS	Correspondence with client and bankruptcy lawyer regarding settlement position to settle civil court action in L&T court together with other related adversary proceeding.	0.30 Hrs	\$172.50
03/14/17	JBSS	Correspondence regarding motion in bankruptcy court to deal with failure to serve predicate notices to terminate lease or petition properly.	0.50 Hrs	\$287.50
03/15/17	JBSS	Conference call with James Bouklas, Mohamed Joseph and Adel to discuss strategy.	0.90 Hrs	\$517.50
03/16/17	JBSS	Call with Andrew G. regarding strategy for moving in bankruptcy court on issues relating to service of predicate notices and preservation of lease issues.	1.00 Hrs	\$575.00
03/20/17	JBSS	Correspondence with Andrew Gottesman regarding settlement offer(0.4); correspondence and review labor contract and lease provisions regarding default(0.5); review memorandum of agreement regarding extra services and labor harmony(0.5).	1.40 Hrs	\$805.00



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03/20/17	JBSS	Draft first interim fee application.	2.10	Hrs	\$1,207.50
03/21/17	JBSS	Settlement meeting at offices of landlord's counsel.	1.80	Hrs	\$1,035.00
03/22/17	JBSS	Continue revising fee application.	0.80	Hrs	\$460.00
03/24/17	JBSS	Research RPAPL and case law regarding service of predicate notices.	0.60	Hrs	\$345.00
03/24/17	JBSS	Research regarding FRCP 41 and voluntary dismissal of adversary proceeding.	0.20	Hrs	\$115.00
03/27/17	JBSS	Correspondence with counsel and general counsel regarding motion to dismiss adversary proceeding.	0.40	Hrs	\$230.00
03/28/17	JBSS	Calls with Jim El Nabli and client regarding adversary proceeding.	0.40	Hrs	\$230.00
03/28/17	JBSS	Research relating to motion to dismiss adversary proceeding status.	0.70	Hrs	\$402.50
03/29/17	JBSS	Conference call with Jim El Nabli and Andrew Gottesman regarding response to motion to dismiss adversary proceeding, strategy and results of research.	1.10	Hrs	\$632.50
03/30/17	JBSS	Draft proposed order and file fee application in accordance with rules.	0.30	Hrs	\$172.50
03/30/17	JBSS	Review motion to withdraw the reference.	1.00	Hrs	\$575.00
03/31/17	JBSS	Review case law regarding motion to withdraw the reference.	0.60	Hrs	\$345.00
04/03/17	JBSS	Review motion to withdraw the reference.	0.60	Hrs	\$345.00
04/03/17	JMS	Reviewing motion to withdraw the reference	1.50	Hrs	\$787.50
04/03/17	JMS	Attention to filing deadlines and service requirements.	0.30	Hrs	\$157.50
04/03/17	JMS	Internal discussion re. same service and filing deadlines.	0.20	Hrs	\$105.00
04/04/17	JBSS	Call with Andrew G. regarding adversary proceeding service issues and stipulation of extension to respond.	0.20	Hrs	\$115.00
04/04/17	JMS	Attention to requirements for extension requests in district and bankruptcy court.	0.40	Hrs	\$210.00
04/04/17	JMS	Drafting stipulation extending time to respond to motion to withdraw	0.40	Hrs	\$210.00
04/04/17	JMS	Drafting Rule 7.1 corporate disclosure statement	0.40	Hrs	\$210.00



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04/04/17	JMS	Email correspondence with J. Schneider re. drafting documents.	0.20	Hrs	\$105.00
04/05/17	JBSS	Correspondence with counsel regarding obtaining agreements to adjourn return dates of adversary proceeding.	0.30	Hrs	\$172.50
04/06/17	JMS	Drafting request for extension and finalizing and filing stipulations to extend time to respond to motion to dismiss and motion to withdraw the reference and drafting notices of appearance.	1.50	Hrs	\$787.50
04/06/17	JMS	Reviewing district court and bankruptcy court rules.	0.50	Hrs	\$262.50
04/06/17	JMS	Email and phone correspondence with J. Schneider, J. Heatherton, and opposing counsel.	0.20	Hrs	\$105.00
04/07/17	JBSS	Meeting at office of Jim El Nabli with Mohamed, Adel and legal team to discuss strategy, settlement possibility and adversary proceeding defense.	1.60	Hrs	\$920.00
04/07/17	JMS	Attention to requirements for extension of briefing schedule for motion to dismiss the adversary proceeding complaint;;	0.50	Hrs	\$262.50
04/07/17	JMS	Email correspondence with team and opposing counsel re. same	0.20	Hrs	\$105.00
04/07/17	JMS	Finalizing and preparing for filing notices of appearance and corporate disclosure statement and related email correspondence.	0.20	Hrs	\$105.00
04/11/17	JMS	Email correspondence with J. Schneider, bankruptcy counsel, and defense counsel, re: extensions of briefing schedules and conference dates for motion to dismiss and motion to withdraw the reference.	0.50	Hrs	\$262.50
04/12/17	JBSS	Review objections to motions for compensation.	0.50	Hrs	\$287.50
04/12/17	JMS	Drafting stipulations extending time for motion to dismiss and motion to withdraw reference.	0.50	Hrs	\$262.50
04/13/17	JBSS	Review demand letter sent by Landlord and demand letter sent by union.	0.40	Hrs	\$230.00
04/13/17	JMS	Attention to stipulations extending time to respond to motions.	0.30	Hrs	\$157.50



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04/13/17	JMS	email correspondence with opposing counsel, co-counsel and team regarding stipulations.	0.20	Hrs	\$105.00
04/14/17	JBSS	Call with Andrew Gottesman regarding motion extensions and other related matters regarding assumption of lease.	0.30	Hrs	\$172.50
04/14/17	JMS	Finalizing and filing stipulation with bankruptcy court; related email correspondence.	0.30	Hrs	\$157.50
04/17/17	JMS	Reviewing bankruptcy court order granting extension; attention to district court stipulation extending time; related email correspondence with J. Schneider and co-counsel.	0.30	Hrs	\$157.50
04/19/17	JBSS	Attend court hearing on motion to evict holdover;	2.50	Hrs	\$1,437.50
04/19/17	JBSS	Call with Andrew Gottesman and update client regarding court hearing.	0.60	Hrs	\$345.00
04/19/17	JMS	Finalizing and filing stipulation extending time to reply to motion to withdraw the reference and related email correspondence with co-counsel and opposing counsel.	0.30	Hrs	\$157.50
04/20/17	JBSS	Call with Mohamed Joseph regarding Tuesday's Court hearing.	0.20	Hrs	\$115.00
04/20/17	JMS	Reviewing court order re. extension of time to reply.	0.10	Hrs	\$52.50
04/21/17	JBSS	Review correspondence by Alan Zuckerbrod regarding potential settlement meeting.	0.20	Hrs	\$115.00
04/27/17	JBSS	Call with Andrew Gottesman regarding potential settlement proposal and comments.	0.30	Hrs	\$172.50
04/28/17	JBSS	Call with Mohamed Joseph and call with James Burklas regarding response to motion to dismiss and motion to confirm the reference.	0.40	Hrs	\$230.00
04/28/17	JMS	Research for opposition to motion to withdraw the reference;	0.70	Hrs	\$367.50
04/28/17	JMS	Email and phone correspondence with J. Schneider re: status and strategy.	0.30	Hrs	\$157.50
05/01/17	JMS	Meeting with J. Schneider, J. Serritella re.strategy for opposition to motion to withdraw the reference to the bankruptcy court.	0.50	Hrs	\$262.50
05/01/17	JS	Review motion to withdraw the reference	0.50	Hrs	\$295.00
05/01/17	JS	review motion to dismiss	0.50	Hrs	\$295.00



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05/01/17	JS	Meeting with J. Siegel re: motions	0.50	Hrs	\$295.00
05/02/17	JMS	Researching and drafting opposition to motion to withdraw the reference.	1.00	Hrs	\$525.00
05/02/17	JMS	Drafting stipulation extending briefing schedule.	0.30	Hrs	\$157.50
05/02/17	JMS	Discussion and email correspondence with J. Schneider re drafting opposition and stipulation.	0.30	Hrs	\$157.50
05/02/17	JS	Attend to emails re: briefing schedule and arguments in connection with opposition to motion to withdraw the reference.	0.50	Hrs	\$295.00
05/03/17	JMS	Drafting opposition to motion to withdraw the reference(2.0);	2.00	Hrs	\$1,050.00
05/03/17	JMS	Phone conference with J. Schneider and bankruptcy counsel (A. Gottesman) re. motion to withdraw the reference.	0.40	Hrs	\$210.00
05/04/17	JMS	Drafting opposition to motion to withdraw the reference.	2.00	Hrs	\$1,050.00
05/05/17	JMS	Drafting opposition to motion to withdraw the reference(1.7);	1.70	Hrs	\$892.50
05/05/17	JMS	Internal discussion re. request for extension and strategy with J. Schneider, J.Serritella, J. Heatherton.	0.30	Hrs	\$157.50
05/05/17	JMS	Email correspondence regarding extension and strategy.	0.30	Hrs	\$157.50
05/07/17	JMS	Drafting declaration for opposition to motion to withdraw.	0.40	Hrs	\$210.00
05/08/17	JBSS	Call with Andrew Gottesman regarding assisting with motion to assume the lease.	0.20	Hrs	\$115.00
05/08/17	JMS	Drafting Schneider Declaration for opposition to motion to withdraw.	0.30	Hrs	\$157.50
05/09/17	JBSS	Call with bankruptcy counsel regarding discovery and research regarding service of predicate notice and notice of termination.	0.50	Hrs	\$287.50
05/09/17	JMS	Meeting with J. Serritella re. draft opposition to motion withdraw reference.	0.50	Hrs	\$262.50
05/09/17	JMS	Email correspondence regarding and review of draft brief.	0.20	Hrs	\$105.00
05/09/17	JS	Work on opposition to motion to withdraw the reference.	2.00	Hrs	\$1,180.00



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05/11/17	JBSS	Call with Andrew Gottesman regarding motion to assume lease.	0.40	Hrs	\$230.00
05/12/17	JBSS	Review and revise motion to assume lease and call with Andrew Gottesman regarding same (x2).	1.10	Hrs	\$632.50
05/12/17	JMS	Research for motion to assume or reject lease and drafting email summary re. same.	0.70	Hrs	\$367.50
05/12/17	JMS	Phone conference with J. Schneider re. motion to assume lease.	0.30	Hrs	\$157.50
05/15/17	JBSS	Call with Andrew Gottesman to review and discuss arguments for motion to assume lease	0.50	Hrs	\$287.50
05/15/17	JMS	Revising opposition to motion to withdraw reference.	0.80	Hrs	\$420.00
05/17/17	JMS	Reviewing and revising draft opposition to motion to withdraw the reference; email correspondence re. same.	3.00	Hrs	\$1,575.00
05/18/17	JMS	Reviewing and revising opposition to motion to dismiss the adversary proceeding complaint and proposed amended complaint.	2.00	Hrs	\$1,050.00
05/18/17	JMS	Reviewing opposition to motion to withdraw the reference.	0.50	Hrs	\$262.50
05/18/17	JMS	Phone conference with J. Schneider re. document revisions.	0.20	Hrs	\$105.00
05/18/17	JS	Work on opposition to motion to withdraw the reference.	0.50	Hrs	\$295.00
05/19/17	JS	Revise draft of opposition to motion to withdraw the reference.	2.00	Hrs	\$1,180.00
05/22/17	JMS	Reviewing J. Serritella comments on opposition to motion to withdraw the reference; related email correspondence.	0.80	Hrs	\$420.00
05/23/17	JMS	Revising opposition to motion to withdraw the reference and related research.	2.90	Hrs	\$1,522.50
05/24/17	JMS	Revising opposition to motion to withdraw the reference.	1.00	Hrs	\$525.00
05/24/17	JMS	Legal research relating to motion to withdraw the reference.	1.00	Hrs	\$525.00
05/25/17	JBSS	Review objection to motion to assume the lease.	1.00	Hrs	\$575.00



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05/25/17	JBSS	Finalize declaration and opposition to motion to withdraw the reference.	0.30	Hrs	\$172.50
05/25/17	JMS	Finalizing and preparing brief, declaration, and exhibits in opposition to motion to withdraw the reference for filing.	2.20	Hrs	\$1,155.00
05/25/17	JMS	Discussions and email correspondence with J. Schneider, J. Serritella, and J. Heatherton re. finalizing and filing brief.	0.50	Hrs	\$262.50
05/25/17	JS	Review final draft of opposition to motion to withdraw the reference.	0.80	Hrs	\$472.00
05/26/17	JBSS	Call with Andrew Gottesman to discuss and prepare for June 1 motion to assume lease hearing and argument.	0.70	Hrs	\$402.50
06/01/17	JBSS	Hearing in bankruptcy court on fee applications and in response to objections by landlord.	2.80	Hrs	\$1,610.00
06/02/17	JBSS	Correspondence with Andrew G. regarding preparations for motion to assume hearing	0.30	Hrs	\$172.50
06/02/17	JBSS	Review order regarding payment.	0.50	Hrs	\$287.50
06/05/17	JBSS	Review reply memo of law in response to motion to withdraw the reference; review signed order regarding payment.	0.70	Hrs	\$402.50
06/12/17	JBSS	Meeting to prepare strategy for motion to assume lease	2.20	Hrs	\$1,265.00
06/13/17	JBSS	Review supplemental objection to motion to assume lease.	0.80	Hrs	\$460.00
06/13/17	JBSS	Correspondence with counsel for landlord regarding canceled court date on motion to dismiss adversary proceeding	0.30	Hrs	\$172.50
06/14/17	JBSS	Attend hearing, oral argument and settlement conferences for K&H with Landlord in bankruptcy court.	3.60	Hrs	\$2,070.00
06/15/17	JBSS	Call with Mohamed Prince to discuss settlement position.	0.30	Hrs	\$172.50
06/16/17	JBSS	Draft interim fee application.	2.30	Hrs	\$1,322.50
06/19/17	JBSS	Settlement conference.	3.30	Hrs	\$1,897.50
06/20/17	JBSS	Call with Andrew Gottesman regarding motion to assume hearing.	0.20	Hrs	\$115.00
06/22/17	JBSS	Review reply to Motion to Dismiss brief.	0.60	Hrs	\$345.00



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06/28/17	JBSS	Attend bankruptcy court for hearing on motion to assume lease.	2.40	Hrs	\$1,380.00
06/29/17	JBSS	Strategize with Andrew G. regarding motion for reconsideration and stay	1.10	Hrs	\$632.50
06/29/17	JBSS	Call with client to discuss stradegy	0.20	Hrs	\$115.00
06/30/17	JBSS	Calls with Andrew G. and Mohamed regarding letter to court regarding Wednesday's hearing.	0.50	Hrs	\$287.50
06/30/17	JBSS	Research issue of stay in connection with motion for reconsideration.	1.00	Hrs	\$575.00
07/05/17	JBSS	Order to deny assumption motion; call with Andrew G.; review motion for a stay and provide comments.	0.90	Hrs	\$517.50
07/07/17	JBSS	Review stipulation to adjourn automatic stay motion.	0.10	Hrs	\$57.50
07/07/17	JBSS	Review and revise motion for stay of order denying lease assumption.	0.80	Hrs	\$460.00
07/11/17	JBSS	Call with Andrew G. regarding Union payment issue.	0.30	Hrs	\$172.50

SUBTOTAL LEGAL SERVICES \$53,447.00

LEGAL SERVICES SUMMARY

Schneider, Jesse B.	Rate: \$575/Hr.	52.50	Hrs	\$30,187.50
James Serritella	Rate: \$590/Hr.	7.30	Hrs	\$4,307.00
Jacklyn Siegel	Rate: \$525/Hr.	36.10	Hrs	\$18,952.50
		95.90	Hrs	\$53,447.00

MATTER TOTAL \$53,447.00

TOTAL LEGAL SERVICES \$53,447.00
TOTAL OTHER CHARGES \$0.00

TOTAL THIS BILL **\$53,447.00**